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Counsel for Defendant Varela Cantarero

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DOUGLAS VARELA CANTARERO,

Defendant.

Case No. CR 3:22-cr-00275-VC

**STIPULATION AND [PROPOSED]  
ORDER TO CONTINUE STATUS  
CONFERENCE**

Mr. Varela Cantarero, together with counsel for the United States, hereby moves this Court for an order continuing the status conference to June 7, 2023, and excluding time under the Speedy Trial Act from April 19, to June 7, 2023. The government is producing additional discovery in this matter and additional time is needed to review it with Mr. Varela Cantarero. Mr. Varela Cantarero is out of custody.

Under 18 U.S.C. § 3161(h)(7)(A), the Court may appropriately exclude time “on the basis of his findings that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.” A failure to grant the requested exclusion of time and continuance would unreasonably deny counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The parties stipulate that a continuance and exclusion of time from April 19, 2023, to June 7, 2023, is therefore appropriate under 18 U.S.C. § 3161(h)(7)(B)(iv), as

the ends of justice served the granting of such continuance outweigh the best interest of the public and the defendant in a speedy trial. For the foregoing reasons, the requested delay in proceedings is warranted and should be excluded under the Speedy Trial Act's exceptions for ends of justice, 18 U.S.C. § 3161(h)(7).

IT IS SO STIPULATED.

DATED:

April 18, 2023  
Date

April 18, 2023  
Date

SIGNED:

/s/  
CHARLES BISESTO  
Assistant United States Attorney

/s/  
GABRIELA BISCHOF  
Attorney for Defendant Varela Cantarero

GOOD CAUSE APPEARING, IT IS SO ORDERED.

April 18, 2023  
Date

